

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MISCELLANEOUS WAREHOUSEMEN'S)
LOCAL 781 HEALTH & WELFARE FUND,)
Plaintiff,) CIVIL ACTION
vs.) NO. 24 C 2281
ARTICO COLD STORAGE CHICAGO, LLC,) JUDGE THOMAS M. DURKIN
a limited liability company,)
Defendant.)

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiff, by its attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, ARTICO COLD STORAGE CHICAGO, LLC, a limited liability company, in the total amount of \$355,133.50, plus Plaintiff's court costs and reasonable attorneys' fees in the amount of \$2,064.50. In support of its motion and the amount of the judgment sought, Plaintiffs are submitting herewith the affidavits of David Dorfman and Catherine Chapman.

On March 25, 2024, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Summer Caliendo-Apa) at the registered office of record in Illinois (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 15, 2024. As Defendant has failed to timely answer the Complaint, Plaintiff respectfully requests entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Patrick N. Ryan

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail and electronic mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 23rd day of April 2024:

Mr. William J. Factor
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/s/ Patrick N. Ryan

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